

PUBLIC DISCLOSURE

April 4, 2005

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**First Bank of Oak Park
1801
11 West Madison Street
Oak Park, Illinois 60302**

**Federal Deposit Insurance Corporation
Division of Supervision and Consumer Protection
Chicago Regional Office
500 West Monroe, Suite 3300
Chicago, Illinois 60661**

NOTE: This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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GENERAL INFORMATION

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision, to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

*This document is an evaluation of the Community Reinvestment Act (CRA) performance of **First Bank of Oak Park** prepared by the **Federal Deposit Insurance Corporation**, the institution's supervisory agency, as of **April 4, 2005**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 345.*

INSTITUTION RATING

INSTITUTION'S CRA RATING: This institution is rated Outstanding.

First Bank of Oak Park has an excellent record of helping to meet the credit needs of its assessment area, in a manner consistent with its resources and capabilities. This rating is supported by the following.

Lending

- The institution's lending levels reflect a good responsiveness to assessment area credit needs.
- A substantial majority of loans originated and evaluated as part of this CRA performance evaluation were inside the bank's assessment area.
- The bank's distribution of borrowers, given the product lines offered by the institution, reflects good penetration among business customers of different sizes.
- Within the assessment area, the geographic distribution of loans reflects excellent penetration in light of opportunities for extending credit in the assessment area.
- First Bank of Oak Park is a leader in making community development loans, which has enhanced its retail lending performance.
- The bank makes adequate use of flexible lending practices in order to serve assessment area credit needs.

Investments

- First Bank of Oak Park has an excellent level of qualified community development investments and grants. The bank's investments exhibit excellent responsiveness to credit and community economic development needs.

Services

- The delivery of retail services reflects adequate responsiveness to the needs of the community members.
- The bank is a leader in providing community development services, which has enhanced the bank's retail services.

Refer to the following information for a complete discussion of the institution's CRA performance.

LENDING, INVESTMENT, AND SERVICE TEST TABLE

*The following table indicates the performance level of **First Bank of Oak Park** with respect to the lending, investment, and service tests.*

PERFORMANCE LEVELS	First Bank of Oak Park		
	PERFORMANCE TESTS		
	Lending Test	Investment Test	Service Test
Outstanding	X	X	X
High Satisfactory			
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

DESCRIPTION OF INSTITUTION AND ASSESSMENT AREA

First Bank of Oak Park (First Bank) is a \$257 million commercial bank headquartered at 11 West Madison Street, Oak Park, Illinois. The bank is a subsidiary of the First Bank of Oak Park (FBOP) Corporation, a multi-bank holding company. In addition to the main facility, the institution maintains two branches, in Oak Park and Chicago, Illinois.

First Bank of Oak Park is a community-oriented financial institution that provides a full range of retail and commercial banking services and products to individuals, small-to-medium size businesses and not-for-profit organizations. The bank offers a traditional variety of deposit, credit, and other financial products to meet the needs of its surrounding communities. Deposit products consist of a conventional mix of savings, checking, certificates of deposit, and money market deposit accounts. In addition, the institution offers credit products for commercial and consumer borrowers including consumer installment loans and lines of credit. Other benefits provided by First Bank of Oak Park include on-line banking via the Internet, an automated telephone banking system, and an informational website which details the bank's various deposit and lending products. Furthermore, customers also have access to 24-hour banking services through the bank's Automated Teller Machines (ATMs). In total, bank customers have access to over 48 ATMs operated by First Bank of Oak Park or its affiliates. In addition, there is no charge to customers for transactions made at any ATMs owned and operated by FBOP Corporation.

According to the institution's December 31, 2004, Consolidated Reports of Condition and Income, the institution reported total assets of \$257 million, net loans in excess of \$176 million, and total deposits in excess of \$222 million, yielding a loan-to-deposit ratio of 79 percent and a loan-to-asset ratio of 68 percent. In addition, as of December 31, 2004, the bank's investment portfolio totaled \$56 million, which represents 22 percent of total assets. Total assets increased approximately \$98 million or 62 percent from March 31, 1999 to December 31, 2004. This growth was primarily attributed to an increase in the loan portfolio, which increased \$55 million or 45 percent, during aforementioned time period. A breakdown of the institution's loan portfolio is detailed in Table A.

<i>Table A – Loan Distribution as of 12/31/2004</i>		
<i>Loan Type</i>	<i>Dollar Amount (000s)</i>	<i>Percent of Total Loans</i>
Construction and Land Development	\$886	<1%
Secured by Farmland	\$0	0%
1-4 Family Residential	\$5,529	3%
Multifamily (5 or more) Residential	\$31,629	18%
Commercial	\$129,607	73%
<i>Total Real Estate Loans</i>	\$167,651	94%
Commercial and Industrial	\$10,491	6%
Agricultural	\$0	0%
Consumer	\$614	<1%
Other	\$3,443	2%
Less: Unearned Income	(\$3,656)	(2%)
<i>Total Loans</i>	\$178,543	100%

Source: Report of Condition

A review of the bank's loan distribution and strategic plan revealed the bank's primary business focus is commercial and commercial real estate lending, which comprise 79 percent of total loans. The bank has also originated a significant number of multifamily loans which provide affordable housing in the assessment area and qualify as community development loans. There are no legal or financial impediments that prevent First Bank of Oak Park from helping to meet the assessment area's credit needs. There are no similarly-situated financial institutions to First Bank of Oak Park due to differences in asset size, branching networks, product lines, and areas served. However, the bank does operate in a highly competitive environment. According to the FDIC's Division of Research and Statistics, as of June 30, 2004, there were 2,746 office facilities of 338 different commercial banks and savings institutions operating within the Chicago Metropolitan Statistical Area (MSA) 1600.

The bank was assigned a CRA rating of "Outstanding" at its prior Community Reinvestment Act evaluation, performed as of March 2, 1999.

In September 2000, the bank was awarded a Bank Enterprise Award from the Community Development Financial Institutions (CDFI) Fund totaling \$38,143. The prestigious award was based on the bank's increased lending and other banking services provided in the bank's assessment area. The purpose of the award is to encourage institutions to increase loans, services, and technical assistance within distressed communities, and to make equity investments or engage in CDFI supported activities.

In 2003, First Bank of Oak Park designated its assessment area as the entire Chicago MSA 1600. In 2004, the bank changed its assessment area to the Chicago-Naperville-Joliet, Illinois Metropolitan Division (MD) 16974. For purposes of this evaluation, the 2000 U.S. Census data and corresponding demographic data for the Chicago MSA 1600 were utilized in evaluating the bank's performance for 2003. In 2004, the bank's performance was evaluated using the 2000 U.S. Census data and corresponding demographic data for the Chicago-Naperville-Joliet, Illinois Metropolitan Division (MD) 16974.

The following paragraphs describe the demographics of the Chicago MSA 1600, which was designated as the bank's assessment area in 2003. The 2004 demographic data for the Chicago-Naperville-Joliet, Illinois Metropolitan Division (MD) 16974 was found to be similar to that of the Chicago MSA data that follows.

The assessment area, the Chicago MSA 1600, is composed of whole geographies and includes the census tracts in which the bank has its offices and automated teller machines. The assessment area does not arbitrarily exclude any low- or moderate-income geographies. Borrower classifications are based on the Department of Housing and Urban Development's (HUD) adjusted Median Family Income (MFI) for 2003 and 2004. Please refer to Appendix B and C for definitions of demographic, housing, and other terms used in this evaluation.

Based on the 2000 U.S. Census data, the assessment area, which encompasses the counties of Cook, DeKalb, DuPage, Grundy, Kane, Kendall, Lake, McHenry and Will, includes 1,875 census tracts. The assessment area includes 244 low-income census tracts (13 percent), 461 moderate-income census tracts (25 percent), 668 middle-income census tracts (36 percent), and 485 upper-income census tracts (26 percent). In addition, there are 17 census tracts (<1 percent) that do not have an income designation, as these census tracts have no or nominal populations. Based on the 2000 U.S. Census Data, the assessment area's low-income and moderate-income families total 21 percent and 18 percent, respectively, while families living below the poverty level represent 8 percent of the total families within the assessment area.

The total population of the assessment area includes 8,272,768 individuals and 2,972,373 households, of which 2,029,140 are families. Based on the 2000 U.S. Census Data, there were 419,018 families residing in low-income census tracts (21 percent); 356,398 families residing in moderate-income census tracts (17 percent); 450,718 families residing in middle-income census tracts (22 percent); and 803,006 families residing in upper-income census tracts (40 percent).

Lending opportunities in the low- and moderate-income census tracts are negatively impacted by the resident's limited capacity to borrow and low owner-occupancy levels. Families living below the poverty level represent 36 percent of the families residing in low-income census tracts and 15 percent of those residing in moderate-income census tracts. Households receiving public assistance represent 17 percent and 7 percent of the households residing in low-income and moderate-income census tracts, respectively. Furthermore, of the housing units located in the low-income and moderate-income census tracts, only 3 percent and 15 percent are owner-occupied, respectively. This data depicts the substantial challenges in extending residential credit in the assessment area's low- and moderate-income areas.

The 2000 median family income (MFI) of the assessment area was \$61,182, which is approximately 10 percent above the State of Illinois' 2000 MFI of \$55,545. In addition, the

median housing value of the assessment area was \$185,276. The median housing value was 45 percent greater than that of the State of Illinois. The median housing value of the assessment area demonstrates that achieving home ownership can be a challenge for low- and moderate-income individuals.

As mentioned previously, the bank has originated a considerable number of multifamily loans that provide affordable housing in the assessment area. Based on the 2000 U.S. Census Data, the assessment area maintains a variety of diverse housing stock. More specifically, 72 percent of the housing units are categorized as one-to-four family structures and 27 percent are multifamily (five or more unit) dwellings. Owner-occupancy levels within the assessment area, at 61 percent, are below the State of Illinois figure of 63 percent. In addition, the level of rental housing located within the assessment area, at 34 percent, is above the State of Illinois level of 31 percent. Moreover, the median age of the homes in the assessment area is 38 years. Affordable housing is needed in the assessment area, because as stated previously, achieving home ownership is difficult for low- and moderate-income families.

Economically, the assessment area maintains a sound commercial base. According to 2003 Dun and Bradstreet data, the assessment area contains 392,012 businesses of various sizes and maturity levels. However, only 3 percent of the businesses are located in low-income census tracts and 13 percent are located in moderate-income census tracts. In addition, approximately 63 percent of the total businesses in the assessment area generated gross revenues of less than \$1 million. The same Dun and Bradstreet data also shows that 55 percent of the businesses in the assessment area employ fewer than 4 employees, while 96 percent of the businesses employ less than 50 employees.

The 2003 Dun and Bradstreet data also reports the most significant portion of working individuals within the assessment area are employed in the service industry (41 percent), while the retail trade industry employs the second largest group of individuals (16 percent). As of December 31, 2003, the unemployment rate for the Chicago MSA was 6.2 percent, which is higher than the State of Illinois figure of 6.0 percent.

Information obtained during recent community contacts revealed that lending and investment opportunities exist for endeavors related to small businesses, affordable housing, and first-time homebuyers. Several community contacts confirmed that economic conditions are generally stable, although some local businesses have been closing or downsizing.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Loans reported pursuant to the institution's Community Reinvestment Act (CRA) data collection requirements from January 1, 2003 to December 31, 2004 are included in this evaluation. Community development loans, investments, and services initiated since the prior evaluation in March 1999 were also reviewed. Lastly, there were no CRA complaints or protests forwarded against the institution since the prior evaluation. Refer to Appendix C for applicable investment definitions and Appendix D for descriptions of the scope of each performance test. The results of each review have been summarized on the following pages.

LENDING TEST

Scope of Test

First Bank of Oak Park's Community Reinvestment performance is based on an analysis of small business lending from January 1, 2003 to December 31, 2004. Although the institution's small business lending distributions by dollar volume were considered within the performance criteria, they are not presented in this evaluation, as the data reflects similar performance to those portrayed by number of loans. The bank's home mortgage performance is not detailed in this evaluation, as the bank's home mortgage lending is not a business focus of the institution nor is it a significant portion of the bank's lending. A review of the bank's home mortgage activity for 2003 and 2004 revealed satisfactory performance. Community development loans were given significant consideration under the Lending Test, as these loans enhanced the bank's retail lending performance. The CRA Performance tables in Appendix E detail the bank's performance with respect to the analysis of lending volume, geographic distribution, and borrower income under the Lending Test.

Lending Activity and Assessment Area Concentration

First Bank of Oak Park's lending levels reflect good responsiveness to the assessment area's credit needs. First Bank of Oak Park reported 129 small business loans totaling \$21 million from January 1, 2003 to December 31, 2004. Of the 365 lenders that originated small business loans within the Chicago MSA 1600 in 2003, First Bank of Oak Park ranked 134th with a 0.03 percent market share by number of loans originated.

First Bank of Oak Park originated a substantial majority of small business loans within the assessment area. Overall, 94 percent of the number and 80 percent of the dollar volume of small business loans originated in 2003 and 2004 were originated inside the assessment area.

Geographic Distribution

First Bank of Oak Park's geographic distribution of loans by income level of the census tract is considered excellent and is further enhanced by the bank's relatively high level of community development lending originated in low- and moderate-income census tracts. An institution's geographic distribution of lending is evaluated to determine how well the institution is serving geographies of different income levels, particularly low- and moderate-income census tracts.

Tables 6a and 6b in Appendix E depict the geographic distribution of small business loans originated in 2003 and 2004 within the assessment area. The tables include comparative data for the percentage of small businesses and aggregate lending data by census tract income category. The 2003 aggregate data reflects the number of small business loans originated by all lenders that are subject to the Large Bank CRA data collection requirements within the bank's assessment area. Aggregate data for 2004 is not currently available.

The bank's performance in extending small business loans to businesses located in low-income and moderate-income census tracts was significantly above the percentage of small businesses

located in low- and moderate-income census tracts and is considered excellent performance. As shown in Tables 6a and 6b, in 2003 and 2004, the bank originated 10 percent and 19 percent of its small business loans in low-income census tracts, respectively. This performance significantly exceeded the number of small businesses located in low-income census tracts at 3 percent for 2003 and 2004, respectively. The bank's performance in low-income census tracts also exceeded the 2003 aggregate level of 2 percent. The bank's performance in moderate-income tracts at 24 percent for 2003 and 35 percent for 2004, also significantly exceeded the level of small businesses operating in moderate-income census tracts in both 2003 (13 percent) and 2004 (14 percent), as well as the 2003 aggregate performance in moderate-income census tracts (12 percent). Overall, the bank's performance illustrates the bank's dedication to serve the needs of small businesses within its assessment area.

Borrower's Profile

This assessment criterion evaluates the institution's performance in extending loans to businesses of different sizes. First Bank of Oak Park's distribution of lending by borrower characteristics is considered good.

Tables 11a and 11b in Appendix E depict the distribution of small business loans originated from January 1, 2003 through December 31, 2004 within the assessment area. Tables 11a and 11b include comparative data for the percentage of small businesses with revenues of \$1 million or less and aggregate data. The aggregate data reflects the number of small business loans originated in 2003 within the assessment area by all lenders that are subject to Large Bank CRA data collection requirements. Again, aggregate data for 2004 is not currently available. Small business loans are analyzed by loan size and revenue size to evaluate the size of the businesses being served. Loan size is generally considered a proxy for the size of the business, with further consideration given to the gross revenue size distribution.

First Bank of Oak Park's distribution of small business loans by loan size is considered good. Table 11a reflects that 64 percent of the small business loans originated in 2003 were extended for loan amounts less \$100,000; 13 percent of the loans were for loan amounts between \$100,000 and \$250,000; and 22 percent of the loans were for loan amounts between \$250,001 and \$1 million. For 2004, Table 11b illustrates that 70 percent of the small business loans were originated for loan amounts under \$100,000; 15 percent of the loans were for loan amounts between \$100,000 and \$250,000; and 15 percent of the loans were for loan amounts between \$250,001 and \$1 million. The bank's solid performance in the lowest loan amount category results from the bank's business strategy to serve small to medium size businesses. Given a substantial majority of the bank's lending performance was originated for loan amounts less than \$250,000, the bank's performance demonstrates the bank's willingness to serve the needs of small businesses and is considered good performance.

First Bank of Oak Park's distribution of small business loans by revenue size is also considered good. The bank originated 45 loans to businesses with revenues of \$1 million or less in 2003 and 38 loans to businesses with revenues of \$1 million or less in 2004. In both years, the bank's performance is above the 63 percent of businesses operating in the assessment area with revenues of \$1 million or less, and significantly above the 2003 aggregate performance of 33 percent. Again, given a majority of the bank's lending performance was originated to businesses whose revenues totaled \$1 million or less, the bank's performance is considered good.

Community Development Lending

First Bank of Oak Park is a leader in originating community development loans within its designated assessment area. Since the previous evaluation on March 2, 1999, the bank originated 115 qualified community development loans totaling \$47,760,000. In aggregate, the institution's qualified lending represents 27 percent of its outstanding total loans as of December 31, 2004. This is a significant increase from the previous evaluation when community development loans totaled \$7 million.

The bank's community development lending efforts primarily focus on affordable housing. Of the 115 qualified community development loans originated since the previous evaluation in March 1999, 64 of these loans were to finance multi-unit apartment buildings and provide affordable housing in the assessment area. Furthermore, of these 64 loans, 59 were originated in low- or moderate-income census tracts. By number, the bank's performance is considered significant, as the majority of these loans are to individual investors, and each transaction requires time and effort by loan officers to get the loan originated. The remaining community development loans were originated to non-profit health facilities or organizations that provide job training, food, clothing, child care and financial assistance to low-income residents in the area. Overall, the bank's community development performance is considered excellent as the bank has strived to address the most salient needs of the assessment area. The number and dollar amount of community development loans within the assessment area is also referenced Tables 1a and 1b of Appendix E.

Innovative and Flexible Lending Programs

First Bank of Oak Park makes adequate use of flexible lending practices in order to serve assessment area credit needs. The bank participates in a micro-loan program targeted at start-up and emerging small businesses. The bank works in conjunction with a local community development company, eight other banks, a local community college small business development center, and the Village of Oak Park. The Village of Oak Park guarantees 50 percent of the each loan originated through the program, and the nine banks participating in the program split the remaining liability. The loans are all underwritten, originated, and serviced by First Bank of Oak Park. Since the previous evaluation, seven loans totaling \$308,250 have been originated under the micro-loan program.

In addition, the bank has facilitated the funding of 37 loans totaling \$3,856,000 through affiliated institutions. These applicants qualified for state funded programs that are established to assist eligible low- and moderate-income individuals. Applicants were directed to the affiliated institution where these specialized programs are offered.

INVESTMENT TEST

First Bank of Oak Park has an excellent level of qualified investments and grants. Overall, the bank has made 270 qualified investments totaling \$8,428,000. As of December 31, 2004, these investments represented 3 percent of total assets, 15 percent of total investments, and 27 percent of equity capital. In addition to qualified grants and donations, the bank invested in mortgage and small business loan pools and certificates of deposit. By dollar volume, the bank's

performance has increased by almost \$5 million or 139 percent since the previous evaluation. Table 14 of Appendix E illustrates the bank's qualified activities since March 1999.

The following are the most notable qualified investments that First Bank of Oak Park provided during the review period.

- In 2003, First Bank of Oak Park committed to purchase a \$2.5 million in an investment fund designed to increase the availability of venture capital for start-up and growing small businesses. Through this fund qualifying small businesses will be able to receive equity capital, long term loans, and expert management assistance. During the evaluation period, the bank funded \$625,000 of this investment.
- In 2002, the bank committed to fund \$1,000,000 in a neighborhood affordable housing organization program. The program provides for mortgage loans to be funded and purchased in the form of mortgage-backed securities. The housing organization provides mortgage loans to low- and moderate-income individuals and the program intends to revitalize Chicago neighborhoods through the creation of affordable housing opportunities. The bank funded \$641,556 of this commitment during the evaluation period.
- First Bank of Oak Park's qualified investments also include 264 qualified donations and grants totaling \$1,973,000 to various community organizations to fund a variety of community development activities, including job creation and economic revitalization.

First Bank of Oak Park's investment activities exhibit excellent responsiveness to the community's credit and economic development needs, as the volume of the bank's qualified investments is considered very high. The volume of investments and documents reviewed during the evaluation provided evidence the bank took a leadership role in developing or partnering with other organizations in order to identify and initiate investment opportunities. The bank's performance has significantly addressed community credit and economic development needs in its assessment area.

SERVICE TEST

Overall, the retail services and alternative delivery systems provided by the institution are considered adequate and consistent with the needs of the assessment area. In addition to the main office, First Bank of Oak Park operates two full service branch offices. These facilities coupled with a variety of alternative delivery systems provide convenient access to all portions of the bank's assessment area. The institution's retail services are augmented with an excellent level of qualified service activities, which have served to appropriately respond to the community development needs of its assessment area.

Retail Banking Services

First Bank of Oak Park's delivery systems are accessible to essentially all portions of the assessment area. In addition to the main office, the institution maintains two branch facilities. All three locations have Automated Teller Machines (ATM). The bank's main office and its office North Avenue branch also have drive-up and walk-up facilities. Two of the bank's offices

are located in upper-income census tracts and one is located in a moderate-income census tract. On numerous occasions, community development organizations have been granted the use of the bank's premises and telephones for meetings or fund raising events. Refer to the distribution of branch offices detailed in Table 15 in Appendix E.

No offices were opened by First Bank of Oak Park during the evaluation period. However, one office was closed since the last evaluation. In July 1999, FBOP Corporation purchased Sterling Savings Bank, which was located in a moderate-income census tract, two blocks from First Bank of Oak Park's North Avenue branch. In September 1999, all of the Sterling Saving Bank accounts were transferred to First Bank of Oak Park and the facility was closed. Due to the close proximity of First Bank of Oak Park's North Avenue branch and the availability of additional hours of operation, the branch closing did not have an adverse impact on the surrounding community.

The institution offers several alternative delivery channels for retail banking services, which provide access to all portions of the institution's assessment area. These delivery systems utilize technology to provide 24-hour access to customer accounts. The bank offers ATM cards, which give customers access to their accounts through the bank's network of three proprietary ATM locations, non-proprietary ATMs, and many retail establishments. First Bank of Oak Park customers can also use their ATM cards at affiliated institutions with no surcharge, giving bank customers access to 48 ATMs operated by First Bank of Oak Park or its affiliates in Illinois.

Additionally, the bank offers automated telephone banking and internet banking services through which customers can make inquiries regarding their deposit and loan accounts and transfer funds. Customers can also sign up for electronic bill payment services. The bank also maintains an internet site at www.firstbankofoakpark.com. The web-site provides a variety of information to customers and non-customers on all of the bank's products and services. Furthermore, Bank-by-Mail service is available, and is geared toward those customers who may not have convenient access to the bank's office locations.

The institution offers a variety of loan and deposit products that address many of the financial needs that exist within its community. Consumer credit products offered by this institution include the following:

Real Estate Loans:

Multifamily Mortgages
Home Equity Loans
Residential Construction Loans
Home Improvement Loans

Other Loan Products:

Stock and Deposit Account Secured Loans
Auto Loans – New and Used
Overdraft Protection
Debit Cards

The bank offers a variety of fixed and variable rate residential loan products through their affiliate, Regency Savings Bank.

Commercial credit alternatives offered by the institution include term loans, lines of credit, equipment loans, commercial real estate loans, and commercial real estate construction and development financing. As mentioned previously, First Bank of Oak Park also participates in a small business micro-loan program.

The institution offers a traditional array of deposit services for both its commercial and consumer customers. Deposit products include a variety of checking, savings, NOW, money market, certificates of deposit, and individual retirement accounts. In October 2003, First Bank of Oak Park began offering free checking accounts. Additional services are geared toward the needs of the bank's commercial customers. These services include cash management, merchant processing, and wire transfers.

In addition, the bank partnered with five organizations to have bank employees visit the organizations and open accounts for the organization's employees. The bank offers these employees free checking accounts, direct deposit, and free online bill pay. Through this program the bank has opened 55 accounts.

Services, including business hours, do not vary in a way that inconveniences any portion of the assessment area or any group of individuals. Full service lobby hours are available at all the bank's locations from at least 9:00am until 4:30pm Monday through Thursday; and from 9:00am until 6:00pm Friday. Saturday lobby hours are available from 8:30am until 12:30pm at the main bank and the North Avenue office. The bank's drive-up facilities are open from 7:30am until 8:00pm Monday through Friday; and from 7:30am to 5:00pm on Saturday. The main bank's walk-up window is available from 7:30am to 8:30am Monday through Saturday; from 4:30 to 6:00pm Monday through Thursday; and from 12:30pm to 2:00pm Saturdays. The North Avenue walk-up facility is open from 4:30pm to 6:00pm Monday through Thursday; from 6:00pm to 8:00pm Friday; and from 12:30pm to 5:00pm Saturday. Overall, branch services are considered reasonably convenient and comparable to other institutions in the bank's assessment area.

Bilingual bank officials are available for customer assistance. The bank has nine employees that have the ability to speak English and Spanish and seven employees that speak English and are conversant in Russian, Greek, Polish, Arabic, French or Slovak. The bank also accepts the Metricula Consular registry cards as a permissible form of identification, which allows Mexican immigrants to open a deposit account. By accepting this form of identification, the bank is providing immigrants access to banking resources which otherwise may not be available.

Community Development Services

First Bank of Oak Park has provided an excellent level of community development services and is considered a leader in providing community development services in its area. The bank has been honored by several community development organizations for its dedication to serving the community. The following is a summary of the community development services that were provided during the review period.

- First Bank of Oak Park makes its employees available to provide qualified services to several community development organizations. During the evaluation period, 33 bank officials provided their financial expertise, holding 52 positions in 25 local non-profit organizations that facilitate community services to low- and moderate-income individuals or stimulate economic growth in the bank's local area.
- The bank offers a bank at school program at three local elementary schools that predominantly serve low- and moderate-income children. Since the previous evaluation, 16 accounts have been opened through this program.

- The bank is also active in providing financial education throughout the assessment area. Since the previous evaluation, the bank participated in nine financial seminars. More specifically, seminars have been provided by bank employees on homeownership, basic banking services, and small business lending.
- The bank partnered with a community group to offer savings accounts to encourage savings accumulation for low-income individuals to save for a home, small business, or education. During the evaluation period, 15 accounts were opened through this program.

COMPLIANCE WITH ANTI-DISCRIMINATION LAWS

No substantive violations of the anti-discrimination laws were identified.

APPENDIX A - SCOPE OF EXAMINATION

First Bank of Oak Park	
SCOPE OF EXAMINATION: Performance under the Lending Test was assessed through an evaluation of the bank's Community Reinvestment Act small business loan data for 2003 and 2004. In addition, a review of the community development loans originated since March 2, 1999 was conducted. Finally, service and investment activities since the last evaluation were reviewed.	
TIME PERIOD REVIEWED:	March 2, 1999 to April 4, 2005
PRODUCTS REVIEWED: Small Business and Community Development.	

LIST OF AFFILIATES AND PRODUCTS REVIEWED		
AFFILIATE(S):	AFFILIATE RELATIONSHIP:	PRODUCTS REVIEWED:

LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA:	TYPE OF EXAMINATION:	BRANCHES VISITED:	OTHER INFORMATION:
The entire portion of Chicago MSA 1600	On-site	None	None

APPENDIX B - GENERAL DEFINITIONS

GEOGRAPHY TERMS

Block: Small areas bounded on all sides by visible features such as streets, roads, streams or rail road tracks, and invisible features like city or town boundaries or property lines. Blocks are subdivisions of census tracts or block numbering areas (BNA), and are assigned a unique three-digit number.

Block Group: Clusters of blocks within a census tract or BNA, having a four-digit number and a three-digit suffix. The four-digit number corresponds to the same number given to the census tract or BNA in which it is located.

Block Numbering Areas (BNAs): Statistical subdivisions of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. BNAs do not cross county lines.

Census Tract: Small subdivisions of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. They usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Metropolitan Area (MA): One or more large population centers and adjacent communities that have a high degree of economic and social integration. Each MA must contain either a place with a minimum population of 50,000 of Census Bureau-defined urbanized area and a total MA population of at least 100,000 (75,000 in New England). An MA comprises one or more central counties and may include one or more outlying counties that have close economic and social relationships with the central county. In New England, MAs are composed of cities and towns rather than whole counties.

Metropolitan Statistical Area (MSA): One or more metropolitan areas that have economic and social ties.

Primary Metropolitan Statistical Area (PMSA): A large urbanized county or cluster of counties that demonstrate very strong internal economic and social links, in addition to close ties to other portions of the larger area. If an area qualifies as an MA and has more than one million persons, PMSAs may be defined within it.

Consolidated Metropolitan Statistical Area (CMSA): The larger area of which PMSAs are component parts.

Non-Metropolitan Area: All areas outside of metropolitan areas. The definition of non-metropolitan area is not consistent with the definition of rural areas. Urban and rural

classifications cut across the other hierarchies; for example, there is generally both urban and rural territory within both metropolitan and non-metropolitan areas.

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, “urban” consists of territory, persons, and housing units in: places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin) but excluding the rural portions of “extended cities”; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.

Rural Area: Territories, populations and housing units that are not classified as urban.

HOUSING TERMS

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family which is further classified into “male householder” (a family with a male householder and no wife present) or “female householder” (a family with a female householder and no husband present).

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Housing Unit: Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

INCOME TERMS

Median Income: The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

Area Median Income: The median family income for the MSA, if a person or geography is located in an MSA; or the statewide non-metropolitan median family income, if a person or geography is located outside an MSA.

Family Income: Includes the income of all members of a family that are age 15 and older.

Household Income: Includes the income of the householder and all other persons that are age 15 and older in the household, whether related to the householder or not. Because many households consist of only one person, median household income is usually less than median family income.

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent in the case of a geography.

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 and less than 80 percent in the case of a geography.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 and less than 120 percent in the case of a geography.

Upper-Income: Individual income that is more than 120 percent of the area median income, or a median family income that is more than 120 percent in the case of a geography.

HUD Adjusted Income Data: The U.S. Department of Housing and Urban Development (HUD) issues annual estimates which update median family income from the metropolitan and non-metropolitan areas. HUD starts with the most recent U.S. Census data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

OTHER TERMS

Home Mortgage Disclosure Loan Application Register (HMDA LAR): The HMDA LARs record all applications received for residential purchase, refinance, home improvement and temporary-to-permanent construction loans.

Small Business Loan: A loan included in “loans to small businesses” as defined in the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$1 million or less and are either secured by nonfarm nonresidential properties or are classified as commercial and industrial loans.

Small Farm Loan: A loan included in “loans to small farms” as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

APPENDIX C - INVESTMENT DEFINITIONS

Community Development Corporation (CDC): A CDC allows banks and holding companies to make equity type of investments in community development projects. The equity investments are subject to limits specified by the bank's regulator. Bank CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community as well as to the financial and marketing needs of the bank. A CDC may purchase, own, rehabilitate, construct, manage and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization. Any real estate ownership should generally be temporary, with ownership reverting to members or organizations in the community.

Community Development Financial Institutions (CDFIs): CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. They procure loans and investments that conventional financial institutions are unable to invest in, and they link financing to other developmental activities. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. CDFIs share a common mission and can be chartered as a credit union or bank. CDFIs can also be unregulated nonprofit institutions that gather private capital from a range of social investors for community development lending or investing. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, microenterprise funds, and community development venture capital funds. A certified CDFI must meet eligibility requirements, which include: having a primary mission of promoting community development; serving an investment area or target population; providing development services; maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means; and not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

Low Income Housing Tax Credits: The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended, which is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department, through the Internal Revenue Service, distributes low-income housing tax credits to housing credit agencies. The housing agencies allocate tax credits on a competitive basis. Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits or sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains in place throughout the compliance period, usually 30 years.

Qualified Investments: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development to support the following endeavors: 1) affordable housing; 2) community services targeting low- and moderate-income individuals; 3) activities that promote economic development by financing small farms and small businesses; and 4) activities that revitalize or stabilize low- and moderate-income geographies.

APPENDIX D - STANDARD PE LANGUAGE

LENDING TEST

Scope of Test

The lending test evaluates the institution's record of helping to meet the credit needs of its assessment area(s) by considering an institution's home mortgage, small business, small farm, and community development lending. The institution's lending performance is evaluated pursuant to the following criteria: 1) the volume of lending activity; 2) the proportion of lending within the assessment area(s); 3) the dispersion of loans and the number and amount of loans in low-, moderate-, middle- and upper-income geographies in the assessment area(s); 4) the distribution of loans among borrowers of low-, moderate-, middle- and upper-income levels and businesses (including farms) of different sizes; 5) the distribution of small business and small farm loans by loan amount at origination; 6) the volume of community development lending; and 7) the use of innovative or flexible lending practices. Performance under the lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

Community Development Lending:

Performance Criteria

The institution's community development lending activities are evaluated pursuant to the following criteria: 1) the extent to which community development lending opportunities have been made available to the institution; 2) the responsiveness of the institution's community development lending; and 3) the extent of leadership the institution has demonstrated in community development lending.

Innovative and Flexible Lending Practices:

Performance Criteria

The institution's innovative and flexible lending practices are evaluated pursuant to the following criteria: 1) the degree to which the loans serve low- and moderate-income creditworthy borrowers in new ways or serve groups of creditworthy borrowers not previously served by the institution; and 2) the success of each product serving low- and moderate-income borrowers, including the number and dollar volume of loans originated during the review period.

INVESTMENT TEST

Scope of Test

The investment test evaluates the institution's record of helping to meet the credit needs of its assessment area(s) through its use of qualified investments that benefit the assessment area(s) or a broader statewide or regional area that includes the institution's assessment area(s). Activities considered under the lending or service test may not be considered under the investment test. The institution's investment performance is evaluated pursuant to the following criteria: 1) the dollar amount of qualified investments; 2) the innovativeness or complexity of qualified investments; 3) the responsiveness of qualified investments to credit and community development needs; and 4) the degree to which the qualified investments are not routinely provided by private investors.

SERVICE TEST

Scope of Test

The service test evaluates the institution's record of helping to meet the credit needs of its assessment area(s) by analyzing both the availability and effectiveness of the institution's systems for delivering retail banking services and the extent and innovativeness of its community development services. The institution's retail banking services are evaluated pursuant to the following criteria: 1) the distribution of the institution's branches among geographies of different income levels; 2) the record of opening and closing branches, particularly branches located in low- and moderate-income geographies or that primarily serve low- or moderate-income individuals; 3) the availability and effectiveness of alternate systems for delivering retail banking services; and 4) the range of services provided in low-, moderate-, middle-, and upper-income geographies and the degree to which the services are tailored to meet the needs of those geographies.

In addition, the institution's community development services are evaluated pursuant to the following criteria: 1) the extent of community development services offered and used; 2) the innovativeness of community development services, including whether they serve low- and moderate-income customers in new ways or serve groups of customers not previously served; 3) the degree to which they serve low- and moderate-income areas or individuals; and 4) their responsiveness to available opportunities for community development services.

APPENDIX E – CRA PERFORMANCE TABLES

FIRST BANK OF OAK PARK, OAK PARK, ILLINOIS

NOTE: The FFIEC has adopted a standard set of data tables, sequentially numbered 1-15, for use in every Large Bank CRA Public Evaluation (PE). Any tables not included in this PE were excluded because the institution has not originated or purchased any loans in the relevant category during the period under review or did not elect to report consumer loan data.

Table 1a. Lending Volume

LENDING VOLUME		Geography: CHICAGO 1600				Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003						
MA/Assessment Area (2003):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Chicago 1600	100.00	40	8,593	67	9,518	0	0	115	47,760	222	65,871	NA

Table 1b. Lending Volume

LENDING VOLUME		Geography: CHICAGO 16974				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004						
MA/Assessment Area (2003):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
16974 Chicago 2004	100.00	41	11,169	54	6,937	0	0	115	47,760	210	65,866	NA

* Loan Data as of December 31, 2003. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from March 2, 1999 to April 4, 2005.

*** Deposit Data as of December 31, 2004. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

* Loan Data as of December 31, 2004. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from March 2, 1999 to April 4, 2005.

*** Deposit Data as of April 19, 2005. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 6a. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: CHICAGO 1600				Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003							
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income [*]			
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Chicago 1600	67	100.00	3.24	10.45	13.35	23.88	38.85	32.84	44.30	32.84	2.29	12.07	40.48	45.17

Table 6b. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: CHICAGO 16974				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004							
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income [*]			
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
16974 Chicago 2004	54	100.00	3.47	18.52	14.05	35.19	40.07	20.37	42.11	25.93	NA	NA	NA	NA

^{*} Based on 2003 Peer Small Business Data -- US and PR

^{**} Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

^{***} Source Data - Dun and Bradstreet (2003).

^{*} Based on

^{**} Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

^{***} Source Data - Dun and Bradstreet (2003).

Table11a. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: CHICAGO 1600		Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Chicago 1600	67	100.00	63.41	67.16	64.18	13.43	22.39	206,205	32.62

Table11b. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: CHICAGO 16974		Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
16974 Chicago 2004	54	100.00	63.66	70.37	70.37	14.81	14.81	NA	NA

* Based on 2003 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2003).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 4.48% of small loans to businesses originated and purchased by the bank.

* Based on

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2003).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 3.70% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: CHICAGO 1600 & 16974			Evaluation Period: MARCH 2, 1999 TO APRIL 4, 2005				
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Chicago 1600	3	2,455	267	5,973	270	8,428	100.00	2	2,233

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography:CHICAGO 1600 & 16974				Evaluation Period: MARCH 2, 1999 TO APRIL 4, 2005					
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Chicago 1600	NA	3	100.00	0.00	33.33	0.00	66.67	0	1	0	- 1	0	0	7.64	23.48	39.45	29.42